



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 7

11201 Renner Boulevard  
Lenexa, Kansas 66219

JUL 14 2017

Mr. David Anderson  
Glenn Springs Holdings, Incorporated  
5 Greenway Plaza, Suite 110  
Houston, Texas 77046

RE: Human Health Risk Assessment Report Review  
Occidental Chemical Corporation, 6200 S. Ridge Road, Wichita, Kansas  
EPA ID # KSD007482029.

Dear Mr. Anderson:

The U.S. Environmental Protection Agency Region 7 has reviewed the Revised Human Health Risk Assessment Report dated May 17, 2017, prepared by GHD Services, Inc. This report is a revised version of the original dated December 29, 2015. Comments are provided below:

- 1) Appendix C, Section 3, page 3, paragraph 1: The text indicates only a portion of the Admin Building 1<sup>st</sup> floor is underlain by a basement. The floor plan figures of the first and second floors show the indoor air sample locations. Theoretically there would be a greater potential of risk in those areas overlying the basement vs. the slab-on-grade portion of the building. Please include a figure showing the layout of the basement with respect to the 1<sup>st</sup> floor to understand whether the 1<sup>st</sup> floor sample was collected from a location overlying the basement.
- 2) Section 4.2.1, page 10: The text should provide a brief description of the types of activities which may take place at the landfill area (mowing, maintenance, etc.), as well as the estimated time expected to be spent in these activities.
- 3) Section 4.3, page 11: Explain which "minor" exposure pathways are evaluated qualitatively in the risk assessment.
- 4) Section 5.3, page 13: The text here states that the discussion of exposure points assumes that the OSHA rules and current best practices are not in place. However, the text in Section 5.4, page 15, states that the discussion of potentially exposed populations assumes that the OSHA rules and current best practices are in place. Clarification and explanation is needed to reconcile these contradictory statements.
- 5) Section 5.3, page 15: The text here relies on data and reports from 2011 to support the conclusion that no unacceptable risks were identified for off-site residents. However, we have previously expressed concerns about the locations of the soil vapor probes that were used to obtain the data evaluated in those reports.

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- 6) Section 5.7.2, page 27: The EPA revised the skin surface area value to 19,652 cm<sup>2</sup> in 2014.
- 7) Section 5.7.2, page 30: The EPA revised the skin surface area values for a child and an adult to 6,365 cm<sup>2</sup> and 19,652 cm<sup>2</sup>, respectively, in 2014.
- 8) Section 7.3.2, page 38: The RME risk value for the future/industrial commercial worker in the non-process area is identified as 1E-04; however, the table does not identify a risk being present. Based on the values in Table 44, an unacceptable risk should have been identified for this receptor.
- 9) Section 7.3.3, page 39: The RME risk value for the current/future construction/utility worker in the landfill area is identified as 1E-04; however, the table does not identify a risk being present. Based on the values in Table 50, an unacceptable risk should have been identified for this receptor.
- 10) Section 7.3.1, page 38: The table for the current/future construction/utility worker shows a non-carcinogenic hazard index of 2E+02. However, the table for the current/future construction/utility worker on page 41 appears to show a non-carcinogenic hazard index of 2E+00. Clarification is needed.
- 11) Section 10, page 53: We noted that the text on page 53 states that the off-site vapor intrusion pathway was not included in this HHRA, and will be evaluated in a separate report. The text also states that GSH is in the process of evaluating the soil vapor data adjacent to the off-site residential properties. We cannot tell from this text whether or not our previous concerns about the off-site soil gas investigation and results will be addressed in that report. As the EPA understands that the off-site work has been completed at this time and can be incorporated into this report, please do so.
- 12) In Tables 31 and 34, the toxicity values shown for 1,2-dichloropropane should be the ones presented in the PPRTV Derivation Support Document, dated September 29, 2016.

Please provide a response/revised report based on the comments above within 30 days receipt of this letter. If you have questions about this letter you may reach me by phone at (913) 551-7279 or email me at [roberts.bradley@epa.gov](mailto:roberts.bradley@epa.gov).

Sincerely,



Brad Roberts  
Environmental Scientist  
RCRA Corrective Action and Permits Section  
Waste Remediation and Permitting Branch  
Air and Waste Management Division

cc: Lisa Thurman, Occidental Chemicals  
Carrie Ridley, KDHE-BWM  
Charles Janson, GHD Services, Inc.